LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL SERVICES

STATEMENT OF BASIS[1]

PROPOSED PART 70 OPERATING PERMIT 1560-00027-V1 and PSD-LA-796

LOOP LLC - PORT COMPLEX
GALLIANO, LAFOURCHE PARISH, LOUISIANA
Agency Interest (AI) No. 4634
Activity No. PER20140001

I. APPLICANT

The applicant is: LOOP LLC
137 Northpark Blvd
Covington, LA 70433

Facility: Port Complex

NAIC Code: 486110

Location: 224 E 101st Pl
Cut Off Louisiana 70345

II. PERMITTING AUTHORITY

The permitting authority is: Louisiana Department of Environmental Quality
Office of Environmental Services
P.O. Box 4313
Baton Rouge, Louisiana 70821-4313

III. CONTACT INFORMATION

Additional information may be obtained from:

Mr. Kermit Wittenburg
P.O. Box 4313
Baton Rouge, Louisiana 70821-4313
Phone: (225) 219-3181

IV. FACILITY BACKGROUND AND CURRENT PERMIT STATUS

LOOP LLC - Port Complex consists of pipeline terminal facilities existing in Galliano and Leeville located in Lafourche Parish.

The LOOP LLC - Port Complex currently operates under Permit No. 1560-00027-V0, issued May 2, 2011.

[1] 40 CFR 70.7(a)(5) and LAC 33:III.531.A.4 require the permitting authority to "provide a statement that sets forth the legal and factual basis for the proposed permit conditions of any permit issued to a Part 70 source, including references to the applicable statutory or regulatory provisions."

STATEMENT OF BASIS

LOOP LLC - PORT COMPLEX
GALLIANO, LAFOURCHE PARISH, LOUISIANA
AGENCY INTEREST (AI) NO. 4634
ACTIVITY NO. PER20140001
Proposed Permit No. 1560-00027-V1 and PSD-LA-796

This permit addresses all emissions unit at the Port Complex.

V. PROPOSED PERMIT/PROJECT INFORMATION

A permit application and Emission Inventory Questionnaire (EIQ) dated December 29, 2014, were received requesting a permit modification. The application was deemed administratively complete in accordance with LAC 33:III.519.A on January 5, 2015.

Pursuant to LAC 33:III.519.A.4, a notice of the completeness determination was published in the Daily Comet, Thibodaux, Louisiana, on February 15, 2015.

Additional information dated April 27, 2015, was also received.

Process Description

The LOOP LLC – Port Complex consists of the Clovelly Dome Storage Terminal in Galliano, the Small Boat Harbor in Leeville, the Fourchon Booster Station in Leeville, and the Marine Offloading Terminal in Grand Isle Block 59 of the Gulf of Mexico. The Clovelly Dome Storage Terminal consists of nine underground storage caverns. These caverns provide storage for crude oil prior to pipeline delivery. Eight of the caverns have a capacity of approximately 7 MM barrels of oil, and one cavern has a capacity of 4 MM barrels of oil. There are 15 existing storage tanks with a capacity of 600,000 bbl. The terminal also consist of surface facilities located in the same general vicinity which include a Brine Storage Reservoir, Operations Building, crude oil storage tanks, fuel and slop oil tanks, a turbine generator, and ancillary equipment. The Small Boat Harbor, which is located on Bayou Lafourche, shelters crew and work boats and includes hose testing facilities. The Fourchon Booster Station is a secured unmanned facility with two large diesel storage tanks and a few small storage tanks. Emission control systems utilized at the LOOP Complex facilities include the latest storage tank technology, mechanical seals on pumps, and low sulfur fuel oil.

Proposed Modifications

LOOP LLC proposes to expand its Clovelly Dome Storage Terminal as follows:

1. Add six (6) 371,000 bbl crude oil storage tanks (Emission Point Nos. 22-14 through 27-14);
2. Increase the tank landings from the previous calculated basis of 26 per year to a calculated basis of 90 tank landings per year;
3. Delete 5 permitted tanks that were never constructed. and adjust the landing losses in the existing cap (Emission Point TANK CAP);
4. Update the Tank Cap emissions basis to include one tank cleaning per year;
5. Update the Tank Cap emissions basis from the previous throughput of 182.5 MMbbl/year to 200 MMbbl/year;

6. Reconcile the size of the 8 larger caverns from the previous 6MMbbl to an actual value of about 6.85 MMbbl, and the smaller cavern from 3 MMbbl to 4 MMbbl;
7. Add $PM_{2.5}$ emissions to the 16 currently permitted engines;
8. Update the emission calculations for the caverns based on converting the EPA WATER9 calculation from version 2 to version 3.
9. Update the insignificant activities based on the audit and to reconcile for lab activities.
10. Reduce engine operating hours from 500 per year to 100 per year.

VI. ATTAINMENT STATUS OF PARISH

Pollutant	Attainment Status	Designation
$PM_{2.5}$	Attainment	N/A
PM_{10}	Attainment	N/A
SO_2	Attainment	N/A
NO_2	Attainment	N/A
CO	Attainment	N/A
Ozone[2]	Attainment	N/A
Lead	Attainment	N/A

VII. PERMITTED AIR EMISSIONS

Sources of air emissions are listed on the "Inventories" page of the proposed permit.

Estimated emissions of criteria pollutants from the facility, in tons per year (TPY), are as follows:

Pollutant	Before	After	Change
PM_{10}	2.34	0.49	-1.85
$PM_{2.5}$	-	0.49	+0.49
SO_2	1.88	0.43	-1.45
NO_X	51.23	10.15	-41.08
CO	10.01	2.24	-7.77
VOC	182.59	437.54	+ 254.95

PM_{10} and VOC compounds classified as LAC 33:III.Chapter 51-regulated toxic air pollutants (TAP) are speciated below. This list encompasses all Hazardous Air Pollutants (HAP) regulated pursuant to Section 112 of the Clean Air Act. Note, however, all TAPs are not HAPs (e.g., ammonia, hydrogen sulfide).

[2] VOC and NO_X are regulated as surrogates.

Pollutant	Before	After	Change
2,2,4-Trimethylpentane	-	0.22	+0.22
Benzene	1.20	2.60	+1.40
Cumene	0.03	0.04	+0.01
Ethyl benzene	0.15	0.26	+0.11
n-Hexane	1.12	2.73	+1.61
Toluene	0.66	1.39	+0.73
Xylenes	0.44	0.76	+0.32

The Port Complex is a major source of criteria pollutants, a minor source of HAPs, and a minor source of TAPs.

Permitted limits for individual emissions units and groups of emissions units, if applicable, are set forth in the tables of the proposed permit entitled "Emission Rates for Criteria Pollutants" and "Emission Rates for TAP/HAP & Other Pollutants." These tables are part of the permit.

Emissions calculations can be found in Appendix A of the permit application. The calculations address the manufacturer's specifications, fuel composition (e.g., sulfur content), emissions factors, and other assumptions on which the emissions limitations are based and have been reviewed by the permit writer for accuracy.

General Condition XVII Activities

Very small emissions to the air resulting from routine operations that are predictable, expected, periodic, and quantifiable and that are submitted by the applicant and approved by the Air Permits Division are considered authorized discharges. These releases are not included in the permit totals because they are small and will have an insignificant impact on air quality. However, such emissions are considered when determining the facility's potential to emit for evaluation of applicable requirements. Approved General Condition XVII activities are noted in Section VIII of the proposed permit.

Insignificant Activities

The emissions units or activities listed in Section IX of the proposed permit have been classified as insignificant pursuant to LAC 33:III.501.B.5. By such listing, the LDEQ exempts these sources or types of sources from the requirement to obtain a permit under LAC 33:III.Chapter 5. However, such emissions are considered when determining the facility's potential to emit for evaluation of applicable requirements.

VIII. REGULATORY APPLICABILITY

Regulatory applicability is discussed in three sections of the proposed permit: Section X (Table 1), Section XI (Table 2), and Specific Requirements. Each is discussed in more detail below.

Section X (Table 1): Applicable Louisiana and Federal Air Quality Requirements

Section X (Table 1) summarizes all applicable federal and state regulations. In the matrix, a "1" represents a regulation applies to the emissions unit. A "1" is also used if the emissions unit is exempt from the emissions standards or control requirements of the regulation, but monitoring, recordkeeping, and/or reporting requirements apply.

A "2" is used to note that the regulation has requirements that would apply to the emissions unit, but the unit is exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified, or reconstructed since the regulation has been effective. If the specific criterion changes, the emissions unit will have to comply at a future date. Each "2" entry is explained in Section XI (Table 2).

A "3" signifies that the regulation applies to this general type of source (e.g., furnace, distillation column, boiler, fugitive emissions, etc.), but does not apply to the particular emissions unit. Each "3" entry is explained in Section XI (Table 2).

If blank, the regulation clearly does not apply to this type of emissions unit.

Section XI (Table 2): Explanation for Exemption Status or Non-Applicability of a Source

Section XI (Table 2) of the proposed permit provides explanation for either the exemption status or non-applicability of given federal or state regulation cited by 2 or 3 in the matrix presented in Section X (Table 1).

Specific Requirements

Applicable regulations, as well as any additional monitoring, recordkeeping, and reporting requirements necessary to demonstrate compliance with both the federal and state terms and conditions of the proposed permit, are provided in the "Specific Requirements" section. Any operating limitations (e.g., on hours of operation or throughput) are also set forth in this section. Associated with each Specific Requirement is a citation of the federal or state regulation upon which the authority to include that Specific Requirement is based.

1. Federal Regulations

40 CFR 60 – New Source Performance Standards (NSPS)

The following subparts are applicable at the Port Complex: A, Ka, Kb, and IIII. Applicable emission standards, monitoring, test methods and procedures, recordkeeping, and reporting requirements are summarized in the "Specific Requirements" section of the proposed permit.

40 CFR 61 – National Emission Standards for Hazardous Air Pollutants (NESHAP)

No NESHAP provisions are applicable to the Port Complex.

40 CFR 63 – Maximum Achievable Control Technology (MACT)

The following subparts are applicable at the Port Complex: A, and ZZZZ. Applicable emission standards, monitoring, test methods and procedures, recordkeeping, and reporting requirements are summarized in the "Specific Requirements" section of the proposed permit.

Clean Air Act §112(g) or §112(j) – Case-By-Case MACT Determinations

A case-by-case MACT determination pursuant to §112(g) or §112(j) of the Clean Air Act was not required.

40 CFR 64 – Compliance Assurance Monitoring (CAM)

Per 40 CFR 64.2(a), CAM applies to each pollutant-specific emissions unit (PSEU) that 1) is subject to an emission limitation or standard, 2) uses a control devices to achieve compliance, and 3) has potential pre-control device emissions that are equal to or greater than 100 percent of the amount, in TPY, required for a source to be classified as a major source.

No emission units are subject to CAM..

Acid Rain Program

The Acid Rain Program, 40 CFR Part 72 – 78, applies to the fossil fuel-fired combustion devices listed in Tables 1-3 of 40 CFR 73.10 and other utility units, unless a unit is determined not to be an affected unit pursuant to 40 CFR 72.6(b). LDEQ has incorporated the Acid Rain Program by reference at LAC 33:III.505. Deepwater Port Complex is not subject to the Acid Rain Program.

2. SIP-Approved State Regulations

Applicable state regulations are also noted in Section X (Table 1) of the proposed permit. Some state regulations have been approved by the U.S. Environmental Protection Agency (EPA) as part of Louisiana's State Implementation Plan (SIP). These regulations are referred to as "SIP-approved" and are enforceable by both LDEQ and EPA. All LAC 33:III.501.C.6 citations are federally enforceable unless otherwise noted.

3. State-Only Regulations

Individual chapters or sections of LAC 33:III noted by an asterisk in Section X (Table 1) are designated "state-only" pursuant to 40 CFR 70.6(b)(2). Terms and conditions of the proposed permit citing these chapters or sections are not SIP-approved and are not subject to the requirements of 40 CFR Part 70. These terms and conditions are enforceable by LDEQ, but not EPA. All conditions not designated as "state-only" are presumed to be federally enforceable.

STATEMENT OF BASIS

LOOP LLC - PORT COMPLEX
GALLIANO, LAFOURCHE PARISH, LOUISIANA
AGENCY INTEREST (AI) NO. 4634
ACTIVITY NO. PER20140001
Proposed Permit No. 1560-00027-V1 and PSD-LA-796

IX. NEW SOURCE REVIEW (NSR)

1. Prevention of Significant Deterioration (PSD)

The facility's source category is listed in Table A of the definition of "major stationary source" in LAC 33:III.509. As such, the PSD major source threshold is 100 TPY (of any regulated NSR pollutant).

Deepwater Port Complex is a major stationary source under the PSD program, LAC 33:III.509. The emissions increases associated with the proposed physical changes and/or changes in the method of operation (without regard to decreases) are as follows:

Pollutant	Project Increase	PSD Significance Level	Netting Required?
PM_{10}	0.00	25/15 (PM/PM_{10})	No
SO_2	0.00	40	No
NO_X	0.00	40	No
CO	0.00	100	No
VOC	254.95	40	Yes

Increases of $PM/PM_{10}/PM_{2.5}$, SO_2, NO_X, and CO associated with the proposed project did not trigger a netting analysis; thus, further review is not required.

Increases of VOC associated with the proposed project triggered a netting analysis.

Pollutant	Project Increase	Contemporaneous Change	Net Emissions Increase	PSD Significance Level	PSD Review Required?
VOC	254.95	0.00	254.95	40	Yes

The proposed modifications will result in a significant net emissions increase of VOC; therefore, PSD requirements, including best available control technology (BACT), apply for these pollutants.

A list of affected emissions units, baseline actual emissions, and projected actual emissions or potential to emit for each emissions unit, as well as a summary of contemporaneous changes associated with the proposed project, can be found in Section 2 of the permit application. This data has been reviewed by the permit writer.

BACT

Under current PSD regulations, an analysis of "top down" BACT is required for the control of each regulated pollutant emitted from a new major stationary source in excess of the specified significant emission rates. The top down approach to the BACT process involves determining the most stringent control technique available for a similar or identical source. If it can be shown that this level of control is infeasible based on technical, environmental, energy, and/or cost considerations, then it is rejected and the next most stringent level of control is determined and similarly evaluated. This process

continues until a control level is arrived at which cannot be eliminated for any technical, environmental, or economic reason. A technically feasible control strategy is one that has been demonstrated to function efficiently on identical or similar processes. Additionally, BACT shall not result in emissions of any pollutant which would exceed any applicable standard under 40 CFR Parts 60 and 61.

BACT was determined to be External Floating roof tanks meeting NSPS Kb.

A more thorough discussion of the BACT selection process can be found in PSD-LA-796. BACT and any other associated monitoring, recordkeeping, and reporting requirements necessary to determine compliance with the PSD permit are cited as "LAC 33:III.509" in the proposed Title V permit.

Air Quality Impact Analyses

Prevention of Significant Deterioration regulations require an analysis of existing air quality for those pollutants emitted in significant amounts from a proposed modified major stationary source. There are no are pollutants of concern in this case.

The net emissions increase of VOC associated with the proposed modification will exceed 100 tons per year; therefore, an ambient air quality analysis and preconstruction monitoring are required for ozone. A detailed explanation is provided in Section 4.6 of the additional information provided on April 27, 2015.

2. Nonattainment New Source Review (NNSR)

The Port Complex is located in an attainment area; therefore, NNSR does not apply.

3. Notification of Federal Land Manager

The Federal Land Manager (FLM) is responsible for evaluating a facility's projected impact on the Air Quality Related Values (AQRV) (e.g., visibility, sulfur and nitrogen deposition, any special considerations concerning sensitive resources, etc.[3]) and recommending that LDEQ either approve or disapprove the facility's permit application based on anticipated impacts. The FLM also may suggest changes or conditions on a permit. However, LDEQ makes the final decision on permit issuance. The FLM also advises reviewing agencies and permit applicants about other FLM concerns, identifies AQRV and assessment parameters for permit applicants, and makes ambient monitoring recommendations.

If LDEQ receives a PSD or NNSR permit application for a facility that "may affect" a Class I area, the FLM charged with direct responsibility for managing these lands is notified.

The meaning of the term "may affect" is interpreted by EPA policy to include all major sources or major modifications which propose to locate within 100 kilometers (km) of a

[3] See http://www2.nature.nps.gov/air/Permits/ARIS/AQRV.cfm.

Class I area. However, if a major source proposing to locate at a distance greater than 100 km is of such size that LDEQ or the FLM is concerned about potential impacts on a Class I area, LDEQ can ask the applicant to perform an analysis of the source's potential emissions impacts on the Class I area. This is because certain meteorological conditions, or the quantity or type of air emissions from large sources located further than 100 km, may cause adverse impacts. In order to determine whether a source located further than 100 km may affect a Class I area, LDEQ uses the Q/d approach.

Q/d refers to the ratio of the sum of the net emissions increase (in tons) of PM_{10}, SO_2, NO_X, and H_2SO_4 to the distance (in kilometers) of the facility from the nearest boundary of the Class I area.

$$Q/d = \frac{PM_{10\,(NEI)} + SO_{2\,(NEI)} + NO_{X\,(NEI)} + H_2SO_{4\,(NEI)}}{\text{Class I km}}$$ [4]

Where:

$PM_{10\,(NEI)}$	=	net emissions increase of PM_{10}
$SO_{2\,(NEI)}$	=	net emissions increase of SO_2
$NO_{X\,(NEI)}$	=	net emissions increase of NO_X
$H_2SO_{4\,(NEI)}$	=	net emissions increase of H_2SO_4
Class I km	=	distance to nearest Class I area (in kilometers)

If Q/d ≥ 4, LDEQ will formally notify the FLM in accordance with LAC 33:III.509.P.1.

In this instance,

$$Q/d = \frac{0.0 + 0.0 + 0.0 + 0.0}{100} = 0$$

Therefore, LDEQ has determined that the proposed project will not adversely impact visibility in Breton National Wildlife Refuge, the nearest Class 1 area.

4. Reasonable Possibility

As previously mentioned, increases of PM/PM_{10}, SO_2, NO_X, and CO associated with the proposed project did not trigger PSD review. Because the applicant elected to use "potential to emit" in lieu of "projected actual emissions" to determine the project increase, there is no "reasonable possibility" that the proposed project may result in a significant emissions increase.

[4] If both NNSR and PSD review are required, the higher of the two "net emissions increase" values has been selected. The net emissions increase for NNSR and PSD purposes may be different due to differing contemporaneous periods. If the net emissions increase of any pollutant is negative, the value used in the equation has been set to zero. If the project did not trigger a netting analysis, LDEQ uses the project increase (see §504.A.3 (NNSR) and §509.A.4 (PSD)). In this case, the value will be less than the pollutant's significance level.

X. ADDITIONAL MONITORING AND TESTING REQUIREMENTS

In addition to the monitoring and testing requirements set forth by applicable state and federal regulations (see Section VIII of this Statement of Basis), a number of "LAC 33:III.507.H.1.a" and/or "LAC 33:III.501.C.6" conditions may appear in the "Specific Requirements" section of the proposed permit. These conditions have been added where no applicable regulation exists or where an applicable regulation does not contain sufficient monitoring, recordkeeping, and/or reporting provisions to ensure compliance. LAC 33:III.507.H.1.a provisions, which may include recordkeeping requirements, are intended to fulfill Part 70 periodic monitoring obligations under 40 CFR 70.6(a)(3)(i)(B).

ID	Description	Pollutant	Method	Frequency
None				

XI. OPERATIONAL FLEXIBILITY

Emissions Caps

An emissions cap is a permitting mechanism to limit allowable emissions of two or more emissions units below their collective potential to emit (PTE). The proposed permit does not establish an emissions cap.

Alternative Operating Scenarios

LAC 33:III.507.G.5 allows the owner or operator to operate under any operating scenario incorporated in the permit. Any reasonably anticipated alternative operating scenarios may be identified by the owner or operator through a permit application and included in the permit. The proposed permit does not include an alternative operating scenario.

Streamlined Requirements

When applicable requirements overlap or conflict, the permitting authority may choose to include in the permit the requirement that is determined to be most stringent or protective as detailed in EPA's "White Paper Number 2 for Improved Implementation of the Part 70 Operating Permits Program" (March 5, 1996). The overall objective is to determine the set of permit terms and conditions that will assure compliance with all applicable requirements for an emissions unit or group of emissions units so as to eliminate redundant or conflicting requirements. The proposed permit does not contain streamlined provisions.

Louisiana Consolidated Fugitive Emission Program (LCFEP)

The Port Complex is not required to comply with a streamlined equipment leak monitoring program.

XII. PERMIT SHIELD

A permit shield, as described in 40 CFR 70.6(f) and LAC 33:III.507.I, provides an

"enforcement shield" which protects the facility from enforcement action for violations of applicable federal requirements. It is intended to protect the facility from liability for violations if the permit does not accurately reflect an applicable federal or federally enforceable requirement.

The proposed permit does not establish a permit shield.

XIII. IMPACTS ON AMBIENT AIR

Emissions associated with the proposed modification were reviewed by the Air Quality Assessment Division to ensure compliance with the NAAQS and AAS. LDEQ did not require the applicant to model emissions.

XIV. COMPLIANCE HISTORY AND CONSENT DECREES

The Port Complex's compliance history can be found in Section 3 of the permit application. It must be disclosed per LAC 33:III.517.E and 517.D.12, if applicable.

No federal or state actions have been issued since the existing permit for the Facility was issued.

XV. REQUIREMENTS THAT HAVE BEEN SATISFIED

The following state and/or federal obligations have been satisfied and are therefore not included as Specific Requirements.

Source ID	Citation	Description
None		

XVI. OTHER REQUIREMENTS

Executive Order No. BJ 2008-7 directs all state agencies to administer their regulatory practices, programs, contracts, grants, and all other functions vested in them in a manner consistent with Louisiana's Comprehensive Master Plan for a Sustainable Coast and public interest to the maximum extent possible. If a proposed facility or modification is located in the Coastal Zone, LDEQ requires the applicant to document whether or not a Coastal Use Permit is required, and if so, whether it has been obtained. Coastal Use Permits are issued by the Coastal Management Division of the Louisiana Department of Natural Resources (LDNR).

The facility is located in the Coastal Zone; however, a Coastal Use Permit is not required.

XVII. PUBLIC NOTICE/PUBLIC PARTICIPATION

Written comments, written requests for a public hearing, or written requests for notification of the final decision regarding this permit action may be submitted to:

STATEMENT OF BASIS

LOOP LLC - PORT COMPLEX
GALLIANO, LAFOURCHE PARISH, LOUISIANA
AGENCY INTEREST (AI) NO. 4634
ACTIVITY NO. PER20140001
Proposed Permit No. 1560-00027-V1 and PSD-LA-796

PPG Staff
LDEQ, Public Participation Group
P.O. Box 4313
Baton Rouge, Louisiana 70821-4313

Written comments and/or written requests must be received prior to the deadline specified in the public notice. If LDEQ finds a significant degree of public interest, a public hearing will be held. All comments will be considered prior to a final permit decision.

LDEQ will send notification of the final permit decision to the applicant and to each person who has submitted written comments or a written request for notification of the final decision.

The permit application, proposed permit, and this Statement of Basis are available for review at LDEQ, Public Records Center, Room 127, 602 North 5th Street, Baton Rouge, Louisiana. Viewing hours are from 8:00 a.m. to 4:30 p.m., Monday through Friday (except holidays). Additional copies may be viewed at the local library identified in the public notice. The available information can also be accessed electronically via LDEQ's Electronic Document Management System (EDMS) on LDEQ's public website, www.deq.louisiana.gov.

Inquiries or requests for additional information regarding this permit action should be directed to the contact identified on page 1 of this Statement of Basis.

Persons wishing to be included on the public notice mailing list or for other public participation-related questions should contact LDEQ's Public Participation Group at P.O. Box 4313, Baton Rouge, LA 70821-4313; by e-mail at maillistrequest@ldeq.org; or contact LDEQ's Customer Service Center at (225) 219-LDEQ (219-5337). Alternatively, individuals may elect to receive public notices via e-mail by subscribing to LDEQ's Public Notification List Service at http://www.doa.louisiana.gov/oes/listservpage/ldeq_pn_listserv.htm.

Permit public notices can be viewed at LDEQ's "Public Notices" webpage, http://www.deq.louisiana.gov/apps/pubNotice/default.asp. Electronic access to each proposed permit and Statement of Basis current on notice is also available on this page. General information related to public participation in permitting activities can be viewed at www.deq.louisiana.gov/portal/tabid/2198/Default.aspx.

STATEMENT OF BASIS

LOOP LLC - PORT COMPLEX
GALLIANO, LAFOURCHE PARISH, LOUISIANA
AGENCY INTEREST (AI) NO. 4634
ACTIVITY NO. PER20140001
Proposed Permit No. 1560-00027-V1 and PSD-LA-796

APPENDIX A - ACRONYMS

AAS	Ambient Air Standard (LAC 33:III.Chapter 51)
AP-42	EPA document number of the Compilation of Air Pollutant Emission Factors
BACT	Best Available Control Technology
BTU	British Thermal Units
CAA	Clean Air Act
CAAA	Clean Air Act Amendments
CAM	Compliance Assurance Monitoring, 40 CFR 64
CEMS	Continuous Emission Monitoring System
CMS	Continuous Monitoring System
CO	Carbon monoxide
COMS	Continuous Opacity Monitoring System
CFR	Code of Federal Regulations
EI	Emissions Inventory (LAC 33:III.919)
EPA	(United States) Environmental Protection Agency
EIQ	Emission Inventory Questionnaire
ERC	Emission Reduction Credit
FR	Federal Register or Fixed Roof
H_2S	Hydrogen sulfide
H_2SO_4	Sulfuric acid
HAP	Hazardous Air Pollutants
Hg	Mercury
HON	Hazardous Organic NESHAP
IBR	Incorporation by Reference
LAER	Lowest Achievable Emission Rate
LDEQ	Louisiana Department of Environmental Quality
M	Thousand
MM	Million
MACT	Maximum Achievable Control Technology
MEK	Methyl ethyl ketone
MIK	Methyl isobutyl ketone
MSDS	Material Safety Data Sheet
MTBE	Methyl tert-butyl ether
NAAQS	National Ambient Air Quality Standards
NAICS	North American Industrial Classification System (replacement to SICC)
NESHAP	National Emission Standards for Hazardous Air Pollutants
NMOC	Non-Methane Organic Compounds

STATEMENT OF BASIS

LOOP LLC - PORT COMPLEX
GALLIANO, LAFOURCHE PARISH, LOUISIANA
AGENCY INTEREST (AI) NO. 4634
ACTIVITY NO. PER20140001
Proposed Permit No. 1560-00027-V1 and PSD-LA-796

APPENDIX A - ACRONYMS

NOx	Nitrogen Oxides
NNSR	Nonattainment New Source Review
NSPS	New Source Performance Standards
NSR	New Source Review
OEA	LDEQ Office of Environmental Assessment
OEC	LDEQ Office of Environmental Compliance
OES	LDEQ Office of Environmental Services
PM	Particulate Matter
PM10	Particulate Matter less than 10 microns in nominal diameter
PM2.5	Particulate Matter less than 2.5 microns in nominal diameter
ppm	parts per million
ppmv	parts per million by volume
ppmw	parts per million by weight
PSD	Prevention of Significant Deterioration
PTE	Potential to Emit
RACT	Reasonably Available Control Technology
RBLC	RACT-BACT-LAER Clearinghouse
RMP	Risk Management Plan (40 CFR 68)
SICC	Standard Industrial Classification Code
SIP	State Implementation Plan
SO2	Sulfur Dioxide
SOCMI	Synthetic Organic Chemical Manufacturing Industry
TAP	Toxic Air Pollutants (LAC 33:III.Chapter 51)
TOC	Total Organic Compounds
TPY	Tons Per Year
TRS	Total Reduced Sulfur
TSP	Total Suspended Particulate
µg/m3	Micrograms per Cubic Meter
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound
VOL	Volatile Organic Liquid
VRU	Vapor Recovery Unit

STATEMENT OF BASIS

LOOP LLC - PORT COMPLEX
GALLIANO, LAFOURCHE PARISH, LOUISIANA
AGENCY INTEREST (AI) NO. 4634
ACTIVITY NO. PER20140001
Proposed Permit No. 1560-00027-V1 and PSD-LA-796

APPENDIX B – GLOSSARY

Best Available Control Technologies (BACT) – an emissions limitation (including a visible emission standard) based on the maximum degree of reduction for each pollutant subject to regulation under this Part (Part III) which would be emitted from any proposed major stationary source or major modification which the administrative authority, on a case-by-case basis, taking into account energy, environmental, and economic impacts and other costs, determines is achievable for such source or modification through application of production processes or available methods, systems, and techniques, including fuel cleaning or treatment or innovative fuel combustion techniques for control of such pollutant.

CAM - Compliance Assurance Monitoring – A federal air regulation under 40 CFR Part 64.

Carbon Monoxide (CO) – (Carbon monoxide) a colorless, odorless gas produced by incomplete combustion of any carbonaceous (gasoline, natural gas, coal, oil, etc.) material.

Cooling Tower – A cooling system used in industry to cool hot water (by partial evaporation) before reusing it as a coolant.

Continuous Emission Monitoring System (CEMS) – The total combined equipment and systems required to continuously determine air contaminants and diluent gas concentrations and/or mass emission rate of a source effluent.

Cyclone – A control device that uses centrifugal force to separate particulate matter from the carrier gas stream.

Federally Enforceable Specific Condition – A federally enforceable specific condition written to limit the potential to Emit (PTE) of a source that is permanent, quantifiable, and practically enforceable. In order to meet these requirements, the draft permit containing the federally enforceable specific condition must be placed on public notice and include the following conditions:

- A clear statement of the operational limitation or condition which limits the source's potential to emit;
- Recordkeeping requirements related to the operational limitation or condition;
- A requirement that these records be made available for inspection by LDEQ personnel;
- A requirement to report for the previous calendar year.

Grandfathered Status – those facilities that were under actual construction or operation as of June 19, 1969, the signature date of the original Clean Air Act. These facilities are not required to obtain a permit. Facilities that are subject to Part 70 (Title V) requirements lose grandfathered status and must apply for a permit.

STATEMENT OF BASIS

LOOP LLC - PORT COMPLEX
GALLIANO, LAFOURCHE PARISH, LOUISIANA
AGENCY INTEREST (AI) NO. 4634
ACTIVITY NO. PER20140001
Proposed Permit No. 1560-00027-V1 and PSD-LA-796

APPENDIX B – GLOSSARY

Lowest Achievable Emission Rate (LAER) – for any source, the more stringent rate of emissions based on the following:

a. the most stringent emissions limitation that is contained in the implementation plan of any state for such class or category of major stationary source, unless the owner or operator of the proposed stationary source demonstrates that such limitations are not achievable; or
b. the most stringent emissions limitation that is achieved in practice by such class or category of stationary source. This limitation, when applied to a modification, means the lowest achievable emissions rate for the new or modified emissions units within the stationary source. In no event shall the application of this term permit a proposed new or modified major stationary source to emit any pollutant in excess of the amount allowable under an applicable new source standard of performance.

NESHAP – National Emission Standards for Hazardous Air Pollutants – Air emission standards for specific types of facilities, as outlined in 40 CFR Parts 61 through 63.

Maximum Achievable Control Technology (MACT) – the maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

NSPS – New Source Performance Standards – Air emission standards for specific types of facilities, as outlined in 40 CFR Part 60.

New Source Review (NSR) – a preconstruction review and permitting program applicable to new or modified major stationary sources of criteria air pollutants regulated under the Clean Air Act (CAA). NSR is required by Parts C ("Prevention of Significant Deterioration of Air Quality") and D ("Nonattainment New Source Review").

Nonattainment New Source Review (NNSR) – a New Source Review permitting program for major sources in geographic areas that do not meet the National Ambient Air Quality Standards (NAAQS) set forth at 40 CFR Part 50. NNSR is designed to ensure that emissions associated with new or modified sources will be regulated with the goal of improving ambient air quality.

Organic Compound – any compound of carbon and another element. Examples: methane (CH_4), ethane (C_2H_6), carbon disulfide (CS_2).

Part 70 Operating Permit – also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507.

STATEMENT OF BASIS

LOOP LLC - PORT COMPLEX
GALLIANO, LAFOURCHE PARISH, LOUISIANA
AGENCY INTEREST (AI) NO. 4634
ACTIVITY NO. PER20140001
Proposed Permit No. 1560-00027-V1 and PSD-LA-796

APPENDIX B – GLOSSARY

PM_{10} –particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

Potential to Emit (PTE) – the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

Prevention of Significant Deterioration (PSD) – a New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.

Selective Catalytic Reduction (SCR) – A non-combustion control technology that destroys NO_X by injecting a reducing agent (e.g., ammonia) into the flue gas that, in the presence of a catalyst (e.g., vanadium, titanium, or zeolite), converts NO_X into molecular nitrogen and water.

Sulfur Dioxide (SO_2) – An oxide of sulphur.

TAP – LDEQ acronym for toxic air pollutants regulated under LAC 33 Part III, Chapter 51, Tables 1 through 3.

"Top Down" Approach – An approach which requires use of the most stringent control technology found to be technically feasible and appropriate based on environmental, energy, economic, and cost impacts.

Title V permit – see Part 70 Operating Permit.

Volatile Organic Compound (VOC) – any organic compound which participates in atmospheric photochemical reactions; that is, any organic compound other than those which the Administrator of the U.S. Environmental Protection Agency designates as having negligible photochemical reactivity.